

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF MISSISSIPPI

GREENVILLE DIVISION

---

MICHAEL ANTHONY NASH,  
JIMMY SHAW,  
VINNIE CASON,  
GRANT LEWIS and  
CHARLESTON TAURVONTA  
HARRIS,

Plaintiffs,

v.

GREGORY CARR,

Defendant.

---

Civil Action

No: 4:25-CV-059-DMB-JMV

**PLAINTIFFS' MOTION TO APPROVE *PRO HAC VICE***  
**APPLICATION OF MARION DELANEY AND WAIVE ASSOCIATED FEES**

Pursuant to Local Uniform Civil Rules for the Northern District of Mississippi and the Southern District of Mississippi Rule 83.1(d)(5), Plaintiffs respectfully request that the Court approve the *pro hac vice* application of attorney Marion Delaney (Dkt. No. 3) and waive the associated fees.

Under Local Rule 83.1(d)(5), an applicant to appear *pro hac vice* will not be required to pay the fee established by Local Uniform Civil Rule 83.1(d)(5) if “the applicant will not charge an attorney fee to the client(s) and is . . . employed or associated with a pro bono project or nonprofit legal services organization in a civil case involving the client(s) of such programs[.]”

Ms. Delaney, who seeks to serve as co-counsel for Plaintiffs, is an attorney at Texas RioGrande Legal Aid, Inc. (“TRLA”), a non-profit organization that provides free legal

services to, among others, indigent migrant farm workers like Plaintiffs. As a public interest law firm, TRLA represents individuals and groups that are otherwise unable to obtain legal representation. TRLA is not charging Plaintiffs any fees for its representation of them in this case.

Plaintiffs therefore respectfully request that this Court grant Plaintiffs' Motion and approve the *pro hac vice* application of Marion Delaney and waive the associated application fees.

Respectfully submitted,

/s/ **Robert McDuff**

Robert McDuff, MS Bar No. 2532  
MISSISSIPPI CENTER FOR JUSTICE  
5 Old River Place, Suite 203  
Jackson, MS 39202  
Telephone: (601) 352-2269  
Facsimile: (601) 352-4769  
[rbm@mcdufflaw.com](mailto:rbm@mcdufflaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on May 16, 2025, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to all registered counsel of record.

s/ Robert McDuff

## CERTIFICATE OF SERVICE

I hereby certify that on May \_\_, 2025, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to all registered counsel of record.

s/ Robert McDuff